

# UNITED STATES DISTRICT COURT

for the

Eastern District of Texas

United States of America

v.

CLIFTON PAPE

SALLY JUNG

*Defendant(s)*

Case No.

5:21-MJ-\_7\_

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Beginning in or before June 2020 and continuing to today in the county of Bowie and elsewhere in the  
Eastern District of Texas and elsewhere, the defendant(s) violated:

*Code Section*

18 U.S.C. § 1031

*Offense Description*

Major fraud against the United States

This criminal complaint is based on these facts:

See attached affidavit.

☒ Continued on the attached sheet.

Appearing by Phone

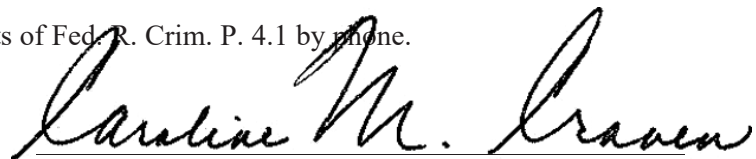
*Complainant's signature*

USSS SA William Mack

*Printed name and title*

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by phone.

Date: 1/12/2021



*Judge's signature*

City and state: Texarkana, Texas

Caroline M. Craven United States Magistrate Judge

*Printed name and title*

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
TEXARKANA DIVISION

UNITED STATES OF AMERICA

v.

CLIFTON PAPE  
SALLY JUNG

§  
§  
§  
§  
§  
§

No. 5:21-MJ-\_7\_  
JUDGE SCHROEDER

**NOTICE OF PENALTY**

**Count One**

VIOLATION:

18 U.S.C. § 1031  
(Major fraud against the United States)

PENALTY:

Imprisonment for not more than ten years; a fine not to exceed \$1,000,000; a term of supervised release of not more than three years. If the gross loss to the Government or the gross gain to a defendant is \$500,000, then a not to exceed \$5,000,000.

SPECIAL ASSESSMENT: \$100.00

**SIGNED this 12th day of January, 2021.**

  
CAROLINE M. CRAVEN  
UNITED STATES MAGISTRATE JUDGE